



**AMERICAN  
STOCK EXCHANGE**  
Equities Options ETFs

Received SEC

MAY 27 2008

Washington, DC 20549

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08048449

May 27, 2008

Mr. Brian Johnson  
Branch Chief  
Securities and Exchange Commission  
Office of Filings and Information Services  
Filer Support #2  
Room #2531  
100 F Street, N.E.  
Washington, D.C. 20549

CERTAMX  
001-32544

Dear Mr. Johnson:

This is to certify that the American Stock Exchange, (the "Exchange") received from Citigroup Funding Inc. (the "Registrant") a copy of the Company's application on Form 8-A for the registration of the following security:

**Strategic Market Access Notes Based Upon the  
Citi U.S. Equity Model Index Due 2011**

We further certify that the above security has been approved by the Exchange for listing and registration, upon official notice of issuance, and understand that the 8A will be immediately effective upon your receipt of this letter.

Sincerely,

*Beth A. Kleiman*

Beth A. Kleiman

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THOMSON REUTERS

END